

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In re Petition of)	CSR-____-E	
)		
Time Warner Cable Inc.)	PSID No. 004604	
For Determination of)		
Effective Competition)		
)	Bellewood	KY0450
)	Blue Ridge Manor	KY0617
)	Brandenburg	KY0953
)	Houston Acres	KY0443
)	LaGrange	KY0575
)	Maryhill Estates	KY0448
)	Moorland	KY0586
)	Muldraugh	KY0607
)	River Bluff	KY0659
)	Strathmoor Manor	KY0382
)	Woodland Hills	KY0512
)	Worthville	KY1076
To: Chief, Media Bureau			

PETITION FOR SPECIAL RELIEF

Time Warner Cable Inc. ("Time Warner Cable"), by its attorneys, and pursuant to Sections 76.7, 76.905(b) and 76.907 of the Commission's rules,¹ hereby petitions the Commission for a finding that Time Warner Cable's cable television system serving the above-captioned communities (unless otherwise noted, individually "Franchise Area" and collectively "Franchise Areas") is subject to effective competition² and therefore exempt from any rate regulation imposed pursuant to Section 623 of the Communications Act of 1934 (the "Act").³

¹ 47 C.F.R. §§ 76.7, 76.905(b), 76.907.

² Pursuant to Section 76.910 of the Commission's rules, rate regulatory authority may be exercised only by a local franchising authority ("LFA") that has been properly certified. 47 C.F.R. § 76.910. To the extent that any political subdivision covered by this petition is an LFA and has been certified to regulate rates in accordance with the Commission's rules, Time Warner Cable respectfully requests that the Commission revoke such certification pursuant to Section 76.914(c). 47 C.F.R. § 76.914(c). To the extent that franchising responsibilities of any political subdivision covered by this petition have been reassigned to another governmental body, *e.g.*, pursuant to legislation providing for state-issued franchises, then that political subdivision is no longer an LFA and obviously would no longer have rate regulatory authority. In such event, Time Warner Cable is nevertheless seeking an effective competition determination to achieve the full competitive flexibility associated therewith.

³ 47 U.S.C. § 543. Time Warner Cable requests that, consistent with Commission precedent, any FCC grant of

I. TIME WARNER CABLE SATISFIES THE “50/15” OR “COMPETING PROVIDER TEST” IN THE FRANCHISE AREAS.

Pursuant to Section 623(a)(2) of the Act,

[i]f the Commission finds that a cable system is subject to effective competition, the rates for the provision of cable service by such system shall not be subject to regulation by the Commission or by a State or franchising authority under this section.⁴

The Act further provides that a cable system will be considered subject to effective competition (and therefore exempt from rate regulation) under the “50/15” test if, *inter alia*, the franchise area is:

(i) served by at least two unaffiliated multichannel video programming distributors each of which offers comparable video programming to at least 50 percent of the households in the franchise area; and

(ii) the number of households subscribing to programming services offered by multichannel video programming distributors other than the largest multichannel video programming distributor exceeds 15 percent of the households in the franchise area.⁵

As demonstrated below, effective competition exists in the Franchise Areas because competing multichannel video programming distributors (“MVPDs”), including direct-to-home (“DTH”) satellite providers such as DirecTV⁶ and DISH Network⁷ (collectively the “DBS Providers”), are available to more than 50 percent, and are subscribed to by more than 15 percent, of the households in such areas.

A. Competing MVPD Services Are “Offered” in the Franchise Areas.

effective competition in the Franchise Areas be effective as of the date of filing of this petition. *See, e.g., Altrio Communications, Inc. v. Adelphia Communications Corporation*, 17 FCC Rcd 22955, ¶ 5 (Med. Bur. 2002) (Commission order released September 26, 2002 found that Adelphia was subject to effective competition in the Arcadia, California franchise area as of October 1, 2001).

⁴ 47 U.S.C. § 543(a)(2).

⁵ 47 U.S.C. § 543(l)(1)(B); *see also* 47 C.F.R. § 76.905(b)(2).

⁶ DirecTV is a registered trademark of DirecTV, Inc.

⁷ DISH Network is a registered trademark of EchoStar Communications Corporation.

According to the Commission's rules, an MVPD's service is deemed to be "offered" for purposes of effective competition:

(1) When the multichannel video programming distributor is physically able to deliver service to potential subscribers, with the addition of no or only minimal additional investment by the distributor, in order for an individual subscriber to receive service; and (2) When no regulatory, technical or other impediments to households taking service exist, and potential subscribers in the franchise area are reasonably aware that they may purchase the services of the multichannel video programming distributor.⁸

As demonstrated below, the DBS providers "offer" service in the Franchise Areas under this definition.

1. The DBS Providers are "Physically Able" to Offer Service to Subscribers in the Franchise Areas.

The Commission has repeatedly determined that DBS service is technically available throughout the continental United States due to its nationwide satellite footprint.⁹ Therefore, the DBS Providers are "physically able" to offer service to subscribers in the Franchise Areas.

2. No Regulatory, Technical or Other Impediments to Households Taking the DBS Providers' Services Exist.

The DBS providers' services are deemed to be technically available in a franchise area if the footprints of their satellites cover the franchise area and there are no local regulations prohibiting reception by home satellite dishes.¹⁰ As noted above, DBS services have been determined by the Commission to be available throughout the United States. Time Warner Cable is aware of no zoning restrictions in the Franchise Areas that would prevent potential subscribers from placing a small dish on their houses or on their properties in order to receive DBS service. Indeed, it would appear that any such restriction would violate Section 207 of the

⁸47 C.F.R. § 76.905(e).

⁹ See, e.g., *Bright House Networks, LLC, Petition for Determination of Effective Competition*, Memorandum Opinion and Order, 22 FCC Rcd 4390, ¶ 6 (Med. Bur. 2007) ("*Bright House Networks*").

¹⁰*Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation*, 8 FCC Rcd 5631, ¶ 32 (1993) ("*Rate Order*").

Telecommunications Act of 1996 and Section 25.104 of the FCC's rules promulgated thereunder.¹¹ Further, the DBS providers do not need franchises to offer service to residents in the Franchise Areas. As such, there are no regulatory, technical or other impediments to households taking the DBS providers' service.

3. Potential Subscribers in the Franchise Areas are "Reasonably Aware" That They May Purchase the DBS Providers' Services.

In light of the Commission's prior findings regarding the ubiquitous availability of DBS service, and in recognition of the DBS Providers' extensive national, regional and local advertising and marketing efforts through television and radio, Internet, print media and direct marketing, potential subscribers throughout the Franchise Areas are undoubtedly "reasonably aware" of the availability of the DBS Providers' services.¹² In addition, the Commission has held that the DBS Providers' extensive nationwide subscribership and growth in recent years, combined with a local DTH penetration of more than 15 percent in any given franchise area, is an accurate sign that potential subscribers within that franchise area are "reasonably aware" of the availability of the DBS Providers' services.¹³

Here, the presence of numerous subscribers of the DBS Providers' services in the Franchise Areas, as shown below, demonstrates that such individuals are all obviously aware of their ability to obtain service from a DBS Provider. Moreover, it is reasonable to assume the

¹¹ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996); see 47 C.F.R. § 25.104.

¹² The DBS Providers maintain comprehensive websites, www.dishnetwork.com and www.directv.com, where consumers can learn more about local retail outlets and how to buy the necessary equipment online or through a toll-free number. See *Rate Order* at n. 104 ("[W]e believe that regional or local marketing, such as by a national or regional 800 telephone number, would suffice."). See also *id.* at ¶ 29; *Adelphia Cable Communications*, 20 FCC Rcd 20487, ¶ 6 (Med. Bur. 2005) ("*Adelphia Effective Competition Order*") (There is "no reason to require needlessly fractionalized marketing in order to ensure that a national or regional programming service is available in a particular community... [P]otential subscribers may be made reasonably aware of the availability of a competing service... through advertising in regional or local media, direct mail, or any other marketing outlet" (citing *Rate Order* at ¶ 29) (emphasis in original)).

¹³ Indeed, the Commission has "found households in a franchise area to be reasonably aware that they may purchase DBS service solely based on evidence of DBS's nationwide growth and local subscriptions, without reference to advertising or other promotion." *Bright House Networks* at ¶ 6 (referencing *Adelphia Communications, et al., Nineteen Unopposed Petitions for Determination of Effective Competition in Forty-Seven Local Franchise Areas*, Memorandum Opinion and Order, 20 FCC Rcd 7503, ¶ 3 (Med. Bur. 2005)).

awareness of the availability of the DBS Providers' services only continues to increase as additional DBS dishes are prominently installed throughout the Franchise Areas.

Because the three factors described above have been satisfied, the DBS Providers "offer" competing MVPD services in the Franchise Areas.

B. The DBS Providers Offer "Comparable Multichannel Video Programming."

Effective competition exists where programming offered by an MVPD competitor is deemed "comparable" to the programming offered by the unaffiliated cable operator.¹⁴ The programming offered by a competing MVPD is deemed "comparable" if it includes "at least 12 channels of video programming, including at least one channel of nonbroadcast service programming."¹⁵ The Commission's decisions have repeatedly concluded that the DBS Providers satisfy § 76.905(g)'s comparable programming criterion.¹⁶

The programming offered by DirecTV and Dish Network, listings of which are available at www.directv.com and www.dishnetwork.com,¹⁷ includes many of the same popular nonbroadcast and broadcast programming services available on Time Warner Cable's system serving the Franchise Areas. The DBS Providers' programming lineups amply demonstrate that at least twelve channels of video programming are offered, including at least one channel of

¹⁴ 47 U.S.C. § 543(l)(1)(B)(i).

¹⁵ 47 C.F.R. § 76.905(g).

¹⁶ See *ACC Cable Communications, FLA-VA, LLC*, 18 FCC Rcd 7110, ¶ 6 (Med. Bur. 2003) (Town of Lake Waccamaw and Town of Tabor City, North Carolina) ("...the Commission has repeatedly concluded that the programming of DBS providers, such as DIRECTV and Dish, satisfy the Commission's [comparable] programming criterion"); *Adelphia Effective Competition Order* at ¶ 7 ("Because different sets of rules govern which stations cable operators and DBS service providers can or must carry, we have never insisted on absolute parity in station offerings. Instead, an MVPD offers 'comparable programming' if it offers 'at least 12 channels of video programming, including at least one channel of nonbroadcast service programming'"); *Time Warner Entertainment-Advance/Newhouse Partnership*, 20 FCC Rcd 15709, n. 15 (Med. Bur. 2005) (Nineteen California Franchise Areas) ("the DBS providers offer well over 100 channels, most of which are non-broadcast channels," which satisfies the comparable programming criterion).

¹⁷ See *The Helicon Group, L.P.*, 17 FCC Rcd 16636, n. 8 (Med. Bur. 2002) (Barnet, Vermont) ("While Charter did not provide in its Petition a copy of EchoStar's nationwide channel lineup, which is otherwise available at www.dishnetwork.com, we have consistently found that the programming of both DBS providers satisfies the programming compatibility component of the competing provider effective competition test.").

nonbroadcast programming service.¹⁸ Thus, the DBS Providers offer “comparable” multichannel video programming, as defined by the Commission, to actual and potential subscribers in the Franchise Areas.

C. The DBS Providers Offer Comparable Multichannel Video Programming to More Than 50 Percent of the Households in the Franchise Areas.

As noted above, at least one MVPD unaffiliated with the incumbent cable operator must offer comparable video programming to at least 50 percent of the households in a franchise area for the first prong of the 50/15 effective competition test to be met.¹⁹ In numerous effective competition decisions, the Commission has concluded that the DBS Providers are deemed to satisfy this 50 percent threshold due to their nationwide satellite footprints.²⁰ Accordingly, since the DBS Providers offer comparable programming to greater than 50 percent of the households in the Franchise Areas, the first prong of the 50/15 effective competition test is satisfied.

D. The Number of Households Subscribing to the Programming Services of Competing MVPDs Exceeds 15 Percent of the Households in the Franchise Areas.

The subscriber base of any MVPD or MVPDs,²¹ other than the largest MVPD, must exceed 15 percent of the households in a franchise area to meet the second prong of the 50/15 test. As demonstrated below, Time Warner Cable’s cable system meets this threshold with respect to the Franchise Areas.²² Time Warner Cable is the largest MVPD in each of these Franchise Areas because it has the most video subscribers in each community.

¹⁸ The DBS Providers satisfy the program comparability standard regardless of whether they provide local-into-local service to the Franchise Area. *See Falcon Telecable*, 17 FCC Rcd 22842, ¶ 4 (Med. Bur. 2002) (Four Texas Communities) (“[T]he Commission’s effective competition program comparability standard does not include a local television programming component.”).

¹⁹ *See* 47 C.F.R. § 76.905(b)(2)(i).

²⁰ *See* note 9.

²¹ *See Time Warner Entertainment Co., L.P., et al. v. FCC*, 56 F.3d 151 (D.C. Cir. 1995) (holding that the subscribership of all MVPDs, other than the largest MVPD, may be aggregated to satisfy the 15 percent threshold). *See also* 47 C.F.R. § 76.905(f).

²² *See attached* Declaration of Ed Kozelek, Regional Vice President of Governmental Relations – Midwest for Time Warner Cable.

Time Warner Cable has used the ZIP+4 methodology previously approved by the Commission in numerous decisions to calculate the DBS Providers' subscribership in the Franchise Areas.²³ Attached as Exhibit A is a report from Media Business Corp. ("MBC") which has identified all of the ZIP+4 zip codes that are encompassed, in whole or in part, by each of these Franchise Areas by using mapping software based on data derived from the U.S. Census Bureau and the U.S. Postal Service. Attached as Exhibit B are the Census 2010 occupied household figures for each of these Franchise Areas. Attached as Exhibit C are reports from the Satellite Broadcasting Communications Association ("SBCA"), which has been charged with the task of providing the required DBS Provider combined subscriber data for effective competition purposes, providing DBS Provider subscriber counts for each Franchise Area and each of the identified ZIP+4 zip codes. Based on this data and summarized in the following table, the DBS providers' subscriber penetration levels clearly exceed 15% in each of these Franchise Areas.

Community	DBS Provider Subscribership	2010 Census Occupied Households	DBS Provider Penetration
Bellewood	37	130	28.46%
Blue Ridge Manor	71	414	17.15%
Brandenburg	176	1,061	16.59%
Houston Acres	57	228	25.00%
La Grange	953	2,964	32.15%
Maryhill Estates	10	62	16.13%
Moorland	52	195	26.67%
Muldraugh	67	416	16.11%
River Bluff	64	149	42.95%
Strathmoor Manor	21	136	15.44%
Woodland Hills	46	282	16.31%
Worthville	13	68	19.12%

Consequently, Time Warner Cable has demonstrated that the second prong of the 50/15 effective competition test has been met for each of these Franchise Areas.

²³ See, e.g., *Marcus Cable Associates, LLC d/b/a Charter Communications, Inc.*, DA 02-2174, 17 FCC Rcd 16652 (Media Bureau 2002) (Denton, Texas), *aff'd* 18 FCC Rcd 9762 (Media Bureau 2003); see also *Vicksburg Video, Inc. d/b/a Wehco Video, Inc.*, DA 02-2176, 17 FCC Rcd 16659 (Media Bureau 2002) (Vicksburg, Mississippi); *Kilgore Video, Inc. d/b/a Wehco Video, Inc.*, DA 02-2177, 17 FCC Rcd 16662 (Media Bureau 2002) (Kilgore, Texas); *Twelve Oregon Cities Order*.

CONCLUSION

Because Time Warner Cable has demonstrated that it is subject to effective competition pursuant to Section 623(l)(1) of the Act and Section 76.905(b) of the Commission's rules for the above captioned Franchise Areas, Time Warner Cable respectfully requests that the Commission expeditiously find that Time Warner Cable's cable system serving the Franchise Areas is not subject to rate regulation as to basic cable service or other forms of rate regulation specified in 47 U.S.C. § 543 and revoke the LFAs' certification to regulate basic rates as appropriate.

Undersigned counsel has read the foregoing Petition, and to the best of such counsel's knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law, and is not interposed for any improper purpose.

Respectfully submitted,

TIME WARNER CABLE INC.

By: 

Craig A. Gilley

EDWARDS WILDMAN PALMER LLP
1255 23rd Street, N.W.
Eighth Floor
Washington, D.C. 20037
(202) 478-7370
Its Attorneys

Dated: November 6, 2013

DECLARATION

I, Ed Kozelek, hereby declare under penalty of perjury that:

1. I am the Regional Vice President of Government Relations – Midwest for Time Warner Cable, the operator of the cable system that serves the specific Franchise Areas involved in the foregoing Petition for Special Relief ("Petition").
2. I have read the foregoing Petition and am familiar with the contents thereof and the matters referred to therein.
3. I have reviewed Time Warner Cable's respective cable subscriber numbers for each of the communities involved in the Petition, as well as the DBS subscriber numbers provided by SBCA and allocated to each as described in the Petition. Time Warner Cable is the largest multichannel video program provider serving each of the Franchise Areas.
4. The facts contained within the Petition are true and correct to the best of my knowledge, information and belief.

Ed Kozelek
Ed Kozelek

Date: 11/6/13

EXHIBIT A

Media Business Corp. Zip Code Identification Report

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated October 25, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for Bellewood, KY	37
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Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

ECTR – Effective Competition Tracking Report



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Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for Blue Ridge Manor, KY	71
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Data is current through 9/30/2013

Report Prepared by:
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Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for Brandenburg, KY	176
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Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes	DTH Count
Requested total for Houston Acres, KY	57

Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes	DTH Count
Requested total for La Grange, KY	953

Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for Maryhill Estates, KY	10
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Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for Moorland, KY	52
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Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for Muldraugh, KY	67
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Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes

DTH Count

Requested total for River Bluff, KY	64
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Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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ZIP Codes

DTH Count

Requested total for Strathmoor Manor, KY	21
--	----

Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated October 25, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: October 29, 2013

ZIP Codes	DTH Count
-----------	-----------

Requested total for Woodland Hills, KY	46
--	----

Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

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Report Date: October 29, 2013

ZIP Codes	DTH Count
Requested total for Worthville, KY	13

Data is current through 9/30/2013

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

EXHIBIT B

2010 Census Household Population

GCT-PL2 - Kentucky: Population and
Housing Occupancy Status: 2010 - State --
Place
2010 Census Redistricting Data (Public
Law 94-171) Summary File

NOTE: For information on confidentiality
protection, nonsampling error, and
definitions, see
<http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the
California, Connecticut, Mississippi, New
Hampshire, Virginia, and Washington P. L.
94-171 Summary Files as delivered.

Geographic area	Total	Housing units		
		Total	Occupied	Vacant
Kentucky	4,339,367	1,927,164	1,719,965	207,199
Bromley city	763	354	316	38
Butler city	612	284	223	61
Crestview Hills city	3,148	1,463	1,388	75
Dry Ridge city	2191	872	809	63
Fairview city	143	67	60	7
Highland Heights city	6,923	2,833	2,610	223
Newport city	15,273	7,146	6,194	952
Silver Grove city	1,102	482	417	65

EXHIBIT C

SBCA Effective Competition Tracking Reports

Franchise & ZIP+4 Identification

Data Documentation

Franchise: Cable operator's franchised service area

Franchise boundary file vintage : County June 2011 (source : Dynamap), MCD June 2011 (source : Dynamap), Place June 2011 (source : Dynamap)

Vintage is the currency of the data as of a specific date and does not correspond exactly to the time of product release because of data-to-product production time.

FIPS: One of a series of codes, issued by the National Institute of Standards and Technology (NIST), assigned for the purpose of ensuring uniform identification of geographic entities throughout all Federal Government programs and agencies.

Each officially recognized Census place has its own unique 5-10 digit identifier. For more information, please see <http://www.census.gov/geo/www/fips/fips.html>.

County: Census county in which the franchise resides

State: State in which the franchise resides

ZIP: United States Postal Service 5-digit ZIP code that covers, either in whole or in part, the cable operator's franchise area.

ZIP Code boundary file vintage : September 2011 (source : Dynamap)

Vintage is the currency of the data as of a specific date and does not correspond exactly to the time of product release because of data-to-product production time.

PLUS4: USPS +4 extension to the 5-digit ZIP code. Using geocoding technology, and using only +4s that could be determined to be entirely within the cable operator's franchise area, MBC determined that each of the ZIP+4s on the tab(s) included in this repo

ZIP4: 5-Digit USPS ZIP code and 4-digit extension.

ZIP+4 boundary file vintage : September 2011 (source : Dynamap)

Vintage is the currency of the data as of a specific date and does not correspond exactly to the time of product release because of data-to-product production time.

USPS Record Type: H - high-rise; F - firm; S - street; R - rural route/highway contract; P - post office box; G - general delivery.

* Type H Records (High Rises, Buildings, Apartments) are assigned a ZIP+4 centroid based on the actual address. If a ZIP+4 centroid cannot be assigned, a ZIP+2 or 5-digit ZIP centroid is assigned.

* Type F Records (Firms) are assigned a ZIP+4 centroid based on the actual address. If a ZIP+4 centroid cannot be assigned, a ZIP+2 or 5-digit centroid is assigned.

* Type S Records (Streets) are assigned a ZIP+4 centroid that falls on an address range. If a ZIP+4 centroid cannot be assigned, a ZIP+2 or 5-digit centroid is assigned.

* Type R Records (Rural Routes) are assigned ZIP+2 centroids if possible. In cases where this is not possible, a 5-digit centroid is assigned.

* Type P (P.O. Box) and Type G (General Delivery Records) are assigned a 5-digit centroid.

ZIP Type: ZIP Type as defined by Dynamap. ZIP Type N = non-unique ZIP, P = PO Box, U = Unique ZIP, M = Military ZIP, G = Tele Atlas, Inc. (GDT, Inc.) ZIP (zero delivery area).

Centroid Type: Each record includes a centroid type code that indicates whether the ZIP+4 has been assigned a ZIP+4, ZIP+2 or 5-digit ZIP centroid.

* ZIP+4 - 1

* ZIP+2 - 2

* 5-digit ZIP - 3

* None - 0

Percent of ZIP in FIPS: The percentage of the ZIP code that is within the geography's borders.

Full ZIP4 coverage: 1 = all ZIP+4's of a ZIP code fall within the geography's borders. 0 = not all ZIP+4's of a ZIP code fall within the geography's borders.

Census 2010 HHS: Count of Census 2010 households by community. For Counties and Minor Civil Divisions (MCDs), HHS reflect count of community minus any incorporated areas within the larger franchise.

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1810 Platte St., Denver, CO 80202
Phone 303.271.9960
Fax 303.271.9965

La Grange	Oldham	KY	40031	0134	400310134	La Grange	Oldham	KY	40031	0186	400310186	La Grange	Oldham	KY	40031	0244	400310244
La Grange	Oldham	KY	40031	0135	400310135	La Grange	Oldham	KY	40031	0190	400310190	La Grange	Oldham	KY	40031	0245	400310245
La Grange	Oldham	KY	40031	0136	400310136	La Grange	Oldham	KY	40031	0191	400310191	La Grange	Oldham	KY	40031	0246	400310246
Oldham	Oldham	KY	40031	0137	400310137	La Grange	Oldham	KY	40031	0192	400310192	La Grange	Oldham	KY	40031	0247	400310247
La Grange	Oldham	KY	40031	0138	400310138	La Grange	Oldham	KY	40031	0193	400310193	La Grange	Oldham	KY	40031	0248	400310248
La Grange	Oldham	KY	40031	0139	400310139	La Grange	Oldham	KY	40031	0194	400310194	La Grange	Oldham	KY	40031	0249	400310249
La Grange	Oldham	KY	40031	0140	400310140	La Grange	Oldham	KY	40031	0195	400310195	La Grange	Oldham	KY	40031	0250	400310250
La Grange	Oldham	KY	40031	0141	400310141	La Grange	Oldham	KY	40031	0196	400310196	La Grange	Oldham	KY	40031	0251	400310251
La Grange	Oldham	KY	40031	0142	400310142	La Grange	Oldham	KY	40031	0197	400310197	La Grange	Oldham	KY	40031	0252	400310252
La Grange	Oldham	KY	40031	0143	400310143	La Grange	Oldham	KY	40031	0198	400310198	La Grange	Oldham	KY	40031	0253	400310253
La Grange	Oldham	KY	40031	0144	400310144	La Grange	Oldham	KY	40031	0199	400310199	La Grange	Oldham	KY	40031	0254	400310254
La Grange	Oldham	KY	40031	0145	400310145	La Grange	Oldham	KY	40031	0200	400310200	La Grange	Oldham	KY	40031	0255	400310255
La Grange	Oldham	KY	40031	0146	400310146	La Grange	Oldham	KY	40031	0201	400310201	La Grange	Oldham	KY	40031	0256	400310256
La Grange	Oldham	KY	40031	0147	400310147	La Grange	Oldham	KY	40031	0202	400310202	La Grange	Oldham	KY	40031	0257	400310257
La Grange	Oldham	KY	40031	0148	400310148	La Grange	Oldham	KY	40031	0203	400310203	La Grange	Oldham	KY	40031	0258	400310258
La Grange	Oldham	KY	40031	0149	400310149	La Grange	Oldham	KY	40031	0204	400310204	La Grange	Oldham	KY	40031	0259	400310259
La Grange	Oldham	KY	40031	0150	400310150	La Grange	Oldham	KY	40031	0205	400310205	La Grange	Oldham	KY	40031	0260	400310260
La Grange	Oldham	KY	40031	0151	400310151	La Grange	Oldham	KY	40031	0206	400310206	La Grange	Oldham	KY	40031	0261	400310261
La Grange	Oldham	KY	40031	0152	400310152	La Grange	Oldham	KY	40031	0207	400310207	La Grange	Oldham	KY	40031	0262	400310262
La Grange	Oldham	KY	40031	0153	400310153	La Grange	Oldham	KY	40031	0208	400310208	La Grange	Oldham	KY	40031	0263	400310263
La Grange	Oldham	KY	40031	0154	400310154	La Grange	Oldham	KY	40031	0209	400310209	La Grange	Oldham	KY	40031	0264	400310264
La Grange	Oldham	KY	40031	0155	400310155	La Grange	Oldham	KY	40031	0210	400310210	La Grange	Oldham	KY	40031	0265	400310265
La Grange	Oldham	KY	40031	0156	400310156	La Grange	Oldham	KY	40031	0211	400310211	La Grange	Oldham	KY	40031	0266	400310266
La Grange	Oldham	KY	40031	0157	400310157	La Grange	Oldham	KY	40031	0212	400310212	La Grange	Oldham	KY	40031	0267	400310267
La Grange	Oldham	KY	40031	0158	400310158	La Grange	Oldham	KY	40031	0213	400310213	La Grange	Oldham	KY	40031	0268	400310268
La Grange	Oldham	KY	40031	0159	400310159	La Grange	Oldham	KY	40031	0214	400310214	La Grange	Oldham	KY	40031	0269	400310269
La Grange	Oldham	KY	40031	0160	400310160	La Grange	Oldham	KY	40031	0215	400310215	La Grange	Oldham	KY	40031	0270	400310270
La Grange	Oldham	KY	40031	0161	400310161	La Grange	Oldham	KY	40031	0216	400310216	La Grange	Oldham	KY	40031	0271	400310271
La Grange	Oldham	KY	40031	0162	400310162	La Grange	Oldham	KY	40031	0217	400310217	La Grange	Oldham	KY	40031	0272	400310272
La Grange	Oldham	KY	40031	0163	400310163	La Grange	Oldham	KY	40031	0218	400310218	La Grange	Oldham	KY	40031	0273	400310273
La Grange	Oldham	KY	40031	0164	400310164	La Grange	Oldham	KY	40031	0219	400310219	La Grange	Oldham	KY	40031	0274	400310274
La Grange	Oldham	KY	40031	0165	400310165	La Grange	Oldham	KY	40031	0220	400310220	La Grange	Oldham	KY	40031	0281	400310281
La Grange	Oldham	KY	40031	0166	400310166	La Grange	Oldham	KY	40031	0221	400310221	La Grange	Oldham	KY	40031	0282	400310282
La Grange	Oldham	KY	40031	0167	400310167	La Grange	Oldham	KY	40031	0222	400310222	La Grange	Oldham	KY	40031	0283	400310283
La Grange	Oldham	KY	40031	0168	400310168	La Grange	Oldham	KY	40031	0223	400310223	La Grange	Oldham	KY	40031	0284	400310284
La Grange	Oldham	KY	40031	0169	400310169	La Grange	Oldham	KY	40031	0224	400310224	La Grange	Oldham	KY	40031	0285	400310285
La Grange	Oldham	KY	40031	0170	400310170	La Grange	Oldham	KY	40031	0225	400310225	La Grange	Oldham	KY	40031	0286	400310286
La Grange	Oldham	KY	40031	0171	400310171	La Grange	Oldham	KY	40031	0226	400310226	La Grange	Oldham	KY	40031	0287	400310287
La Grange	Oldham	KY	40031	0172	400310172	La Grange	Oldham	KY	40031	0227	400310227	La Grange	Oldham	KY	40031	0288	400310288
La Grange	Oldham	KY	40031	0173	400310173	La Grange	Oldham	KY	40031	0228	400310228	La Grange	Oldham	KY	40031	0289	400310289
La Grange	Oldham	KY	40031	0174	400310174	La Grange	Oldham	KY	40031	0229	400310229	La Grange	Oldham	KY	40031	0290	400310290
La Grange	Oldham	KY	40031	0175	400310175	La Grange	Oldham	KY	40031	0230	400310230	La Grange	Oldham	KY	40031	0291	400310291
La Grange	Oldham	KY	40031	0176	400310176	La Grange	Oldham	KY	40031	0231	400310231	La Grange	Oldham	KY	40031	0292	400310292
La Grange	Oldham	KY	40031	0177	400310177	La Grange	Oldham	KY	40031	0232	400310232	La Grange	Oldham	KY	40031	0293	400310293
La Grange	Oldham	KY	40031	0178	400310178	La Grange	Oldham	KY	40031	0233	400310233	La Grange	Oldham	KY	40031	0294	400310294
La Grange	Oldham	KY	40031	0179	400310179	La Grange	Oldham	KY	40031	0234	400310234	La Grange	Oldham	KY	40031	0295	400310295
La Grange	Oldham	KY	40031	0180	400310180	La Grange	Oldham	KY	40031	0235	400310235	La Grange	Oldham	KY	40031	0296	400310296
La Grange	Oldham	KY	40031	0181	400310181	La Grange	Oldham	KY	40031	0236	400310236	La Grange	Oldham	KY	40031	0297	400310297
La Grange	Oldham	KY	40031	0182	400310182	La Grange	Oldham	KY	40031	0237	400310237	La Grange	Oldham	KY	40031	0298	400310298
La Grange	Oldham	KY	40031	0183	400310183	La Grange	Oldham	KY	40031	0238	400310238	La Grange	Oldham	KY	40031	0299	400310299
La Grange	Oldham	KY	40031	0184	400310184	La Grange	Oldham	KY	40031	0239	400310239	La Grange	Oldham	KY	40031	0300	400310300
La Grange	Oldham	KY	40031	0185	400310185	La Grange	Oldham	KY	40031	0240	400310240	La Grange	Oldham	KY	40031	0301	400310301
La Grange	Oldham	KY	40031	0186	400310186	La Grange	Oldham	KY	40031	0241	400310241	La Grange	Oldham	KY	40031	0302	400310302
La Grange	Oldham	KY	40031	0187	400310187	La Grange	Oldham	KY	40031	0242	400310242	La Grange	Oldham	KY	40031	0303	400310303
La Grange	Oldham	KY	40031	0188	400310188	La Grange	Oldham	KY	40031	0243	400310243	La Grange	Oldham	KY	40031	0304	400310304

City	County	Address	City	County	Address
Woodland Hills	Jefferson	KY 40243 2027 402432027	Worthville	Carroll	KY 41098 9776 410989776
Woodland Hills	Jefferson	KY 40243 2028 402432028			
Woodland Hills	Jefferson	KY 40243 2029 402432029			
Woodland Hills	Jefferson	KY 40243 2030 402432030	1090 96		
Woodland Hills	Jefferson	KY 40243 2031 402432031			
Woodland Hills	Jefferson	KY 40243 2032 402432032			
Woodland Hills	Jefferson	KY 40243 2033 402432033			
Woodland Hills	Jefferson	KY 40243 2034 402432034			
Woodland Hills	Jefferson	KY 40243 2035 402432035			
Woodland Hills	Jefferson	KY 40243 2036 402432036			
Woodland Hills	Jefferson	KY 40243 2037 402432037			
Woodland Hills	Jefferson	KY 40243 2038 402432038			
Woodland Hills	Jefferson	KY 40243 2040 402432040			
Woodland Hills	Jefferson	KY 40243 2041 402432041			
Woodland Hills	Jefferson	KY 40243 2042 402432042			
Woodland Hills	Jefferson	KY 40243 2043 402432043			
Woodland Hills	Jefferson	KY 40243 2044 402432044			
Woodland Hills	Jefferson	KY 40243 2045 402432045			
Woodland Hills	Jefferson	KY 40243 2046 402432046			
Woodland Hills	Jefferson	KY 40243 2047 402432047			
Woodland Hills	Jefferson	KY 40243 2048 402432048			
Woodland Hills	Jefferson	KY 40243 2049 402432049			
Woodland Hills	Jefferson	KY 40243 2050 402432050			
Woodland Hills	Jefferson	KY 40243 2050 402432050			
Woodland Hills	Jefferson	KY 40243 2061 402432061			
Woodland Hills	Jefferson	KY 40243 2062 402432062			
Woodland Hills	Jefferson	KY 40243 2063 402432063			
Woodland Hills	Jefferson	KY 40243 2064 402432064			
Woodland Hills	Jefferson	KY 40243 2065 402432065			
Woodland Hills	Jefferson	KY 40243 2069 402432069			
Woodland Hills	Jefferson	KY 40243 2070 402432070			
Woodland Hills	Jefferson	KY 40243 2071 402432071			
Woodland Hills	Jefferson	KY 40243 2072 402432072			
Woodland Hills	Jefferson	KY 40243 2073 402432073			
Woodland Hills	Jefferson	KY 40243 2074 402432074			
Woodland Hills	Jefferson	KY 40243 2075 402432075			
Woodland Hills	Jefferson	KY 40243 2076 402432076			
Woodland Hills	Jefferson	KY 40243 2087 402432087			
Woodland Hills	Jefferson	KY 40243 2088 402432088			
Woodland Hills	Jefferson	KY 40243 2097 402432097			
Worthville	Carroll	KY 41098 4700 410984700			
Worthville	Carroll	KY 41098 4701 410984701			
Worthville	Carroll	KY 41098 4702 410984702			
Worthville	Carroll	KY 41098 9070 410989070			
Worthville	Carroll	KY 41098 9073 410989073			
Worthville	Carroll	KY 41098 9083 410989083			
Worthville	Carroll	KY 41098 9216 410989216			
Worthville	Carroll	KY 41098 9230 410989230			
Worthville	Carroll	KY 41098 9600 410989600			
Worthville	Carroll	KY 41098 9601 410989601			
Worthville	Carroll	KY 41098 9652 410989652			
Worthville	Carroll	KY 41098 9700 410989700			
Worthville	Carroll	KY 41098 9731 410989731			
Worthville	Carroll	KY 41098 9764 410989764			
Worthville	Carroll	KY 41098 9775 410989775			

CERTIFICATE OF SERVICE

I, Penny Evetts, a secretary at the law firm of Edwards Wildman Palmer LLP, hereby certify that, on this 6th day of November, 2013, copies of the foregoing "Petition for Special Relief" were sent via first-class mail, postage prepaid, to the following:

William Lake, Esq.*
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Pantelis Michalopoulos, Esq.
Steptoe & Johnson LLP
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Washington, D.C. 20036
Counsel for EchoStar Communications Corp.

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Muldraugh, Kentucky 40155

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Mayor Mike Ober
101 Shelby Point
Louisville, Kentucky 40223

City of Houston Acres
Mayor Charles Bartman
4302 Martha Avenue
Louisville, Kentucky 40220

City of Maryhill Estates
Mayor Steve Gutermuth
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Louisville, Kentucky 40207

City of Strathmoor Manor
Mayor Dennis Boyd
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Louisville, Kentucky 40205

City of Worthville
Mayor Terry A. Hagedorn
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Harris, Wiltshire & Grannis LLP
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Counsel for DirecTV, Inc.

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Louisville, Kentucky 40031

City of Bellewood
Mayor Kevin Orr
3911 Leland Road
Louisville, Kentucky 40207

City of Brandenburg
Mayor David Pace
City Hall
737 High Street
Brandenburg, Kentucky 40108

City of River Bluff
Mayor Bryan Dillon
P.O. Box 792
Prospect, Kentucky 40059

City of Moorland
Mayor Dwight Grammer
1904 Claremoor Drive
Louisville, Kentucky 40223

City of Woodland Hills
Mayor David Tilford
502 Westwood Drive
Louisville, Kentucky 40243

*Via ECFS


Penny Evetts

Agency Tracking ID:PGC2411841 Authorization Number:02220G Successful Authorization -- Date Paid: 11/6/13 FILE COPY ONLY!!

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #979089	FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE FORM 159 PAGE NO 1 OF 1	APPROVED BY OMB 3060-059 SPECIAL USE FCC USE ONLY
SECTION A - Payer Information		
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Time Warner Cable Inc.		(3) TOTAL AMOUNT PAID (dollars and cents) \$2710.00
(4) STREET ADDRESS LINE NO. 1 60 Columbus Circle		
(5) STREET ADDRESS LINE NO. 2		
(6) CITY New York	(7) STATE NY	(8) ZIP CODE 10023
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 212-3648482		(10) COUNTRY CODE (IF NOT IN U.S.A.) US
FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED		
(11) PAYER (FRN) 0007556251		(12) FCC USE ONLY
IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)		
(13) APPLICANT NAME Time Warner Cable Inc.		
(14) STREET ADDRESS LINE NO. 1 60 Columbus Circle		
(15) STREET ADDRESS LINE NO. 2		
(16) CITY New York	(17) STATE NY	(18) ZIP CODE 10023
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 212-3648482		(20) COUNTRY CODE (IF NOT IN U.S.A.) US
FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED		
(21) APPLICANT (FRN) 0007556251		(22) FCC USE ONLY
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET		
(23A) FCC Call Sign/Other ID 004604	(24A) Payment Type Code(PTC) TQC	(25A) Quantity 1
(26A) Fee Due for (PTC) \$1,355.00	(27A) Total Fee \$1355.00	FCC Use Only
(28A) FCC CODE 1 KY0450	(29A) FCC CODE 2 x	
(23B) FCC Call Sign/Other ID 006106	(24B) Payment Type Code(PTC) TQC	(25B) Quantity 1
(26B) Fee Due for (PTC) \$1,355.00	(27B) Total Fee \$1355.00	FCC Use Only
(28B) FCC CODE 1 KY0664	(29B) FCC CODE 2 x	

**Online Payment****Step 3: Confirm Payment****1 | 2 | 3****Thank you.****Your transaction has been successfully completed.****Pay.gov Tracking Information****Application Name:** Remittance Advice**Pay.gov Tracking ID:** 25D214UK**Agency Tracking ID:** PGC2411841**Transaction Date and Time:** 11/06/2013 14:37 EST**Payment Summary****Address Information****Account Holder** Robert C.**Name:** McGowan**Billing Address:** 20 Church Street**Billing Address 2:****City:** Hartford**State / Province:** CT**Zip / Postal Code:** 06103**Country:** USA**Account Information****Card Type:** Visa**Card Number:** *****9545**Payment Information****Payment Amount:** \$2,710.00**Transaction Date** 11/06/2013 14:37
and Time: EST